

Stephen J. Obermeier
202.719.7465
sobermeier@wiley.law

wiley

Wiley Rein LLP
2050 M Street NW
Washington, DC 20036
Tel: 202.719.7000

wiley.law

June 17, 2022

VIA ECF FILING

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICANT GRANTED
SO ORDERED

Dr. Koeltl
John G. Koeltl, U.S.D.J.

Re: *Comcast Cable Commc'ns, LLC v. Mission Broadcasting, Inc.*, Case No. 1:21-cv-06860

Dear Judge Koeltl:

Pursuant to Rule VI.A.2 of Your Honor's Individual Practices, Third-Party Defendant Mission Broadcasting, Inc. ("Mission") respectfully moves to permanently seal the unredacted version of Plaintiff and Counterclaim-Defendant Nexstar Media Inc.'s ("Nexstar") Request for Pre-Motion Conference (ECF No. 80).

Nexstar's Request for Pre-Motion Conference contains references to, and verbatim quotations from, a confidential Retransmission Consent Agreement between Third-Party Plaintiff Comcast Cable Communications, LLC ("Comcast") and Mission (the "Mission-Comcast RCA"). As Mission explained in a prior motion to seal, Comcast and Mission agreed to maintain the strict confidentiality of the Mission-Comcast RCA, which contains highly confidential business and competitive information that is not generally known in the market. *See* ECF No. 59.

On May 24, 2022, this Court granted Mission's motion and entered an Order permanently sealing the portions of Comcast's Third-Party Complaint and Answer and Counterclaim referencing and/or quoting from the Mission-Comcast RCA. *See* ECF No. 64. Because Nexstar's Request for Pre-Motion Conference likewise references and quotes from the Mission-Comcast RCA, Mission requests that the redacted portions of Nexstar's Request for Pre-Motion Conference likewise remain permanently sealed.

Mission has met and conferred with both Nexstar and Comcast, and neither opposes this letter-motion. Accordingly, Mission hereby requests that the Court permit (i) the unredacted version of Nexstar's Request for Pre-Motion Conference (ECF No. 80) to remain permanently sealed, and (ii) only the redacted version of Nexstar's Request for Pre-Motion Conference (ECF No. 81) to remain on the public docket.

We are available to provide any further information that may aid the Court in its determination of this matter.

June 17, 2022
Page 2

Respectfully submitted,

/s/ Stephen Obermeier
Stephen J. Obermeier (*pro hac vice*)

Counsel for Mission Broadcasting, Inc.

cc: All counsel of record (via ECF)